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10 Attorneys for Plaintiff
11 FACEBOOK, INC.

12 UNITED STATES DISTRICT COURT
13 NORTHERN DISTRICT OF CALIFORNIA
14 SAN JOSE DIVISION
15

16 FACEBOOK, INC.,

17 Plaintiff,

18 v.
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20 POWER VENTURES, INC., a Cayman Island
corporation; STEVE VACHANI, an individual;
21 DOE 1, d/b/a POWER.COM, DOES 2-25,
inclusive,

22 Defendants.
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Case No. 5:08-cv-05780 LHK

**DECLARATION OF I. NEEL
CHATTERJEE IN SUPPORT OF
FACEBOOK'S ADMINISTRATIVE
MOTION FOR *IN CAMERA* REVIEW OF
BILLING RECORDS**

Dept: Courtroom 8, 4th Floor
Judge: Hon. Judge Lucy H. Koh

1 I, I. Neel Chatterjee, declare as follows:

2 1. I am an attorney with the law firm of Goodwin Procter LLP (“Goodwin”), counsel of
3 record to Facebook, Inc. (“Facebook”) in the above-captioned matter. I am a member in good
4 standing of the Bar of the States of California. I make this declaration based on my personal
5 knowledge, unless otherwise noted. If called, I can and will testify competently to the matters set
6 forth herein.

7 2. Facebook seeks permission to submit Goodwin and Orrick, Herrington & Sutcliffe
8 LLP’s (“Orrick”) billing for *in camera* review by the Court because these documents include
9 Facebook’s, Orrick’s and Goodwin’s privileged information, including specific details related to
10 Orrick and Goodwin’s billing records and services performed. Facebook, Orrick and Goodwin have
11 a business need to maintain the confidentiality of the privileged material, as such business
12 information is commercially sensitive and not publically known and could prejudice Facebook and
13 its outside counsel in future negotiation.

14 I declare under penalty of perjury that the foregoing is true and correct to the best of my
15 knowledge. Executed this 3rd day of August, 2017 in Menlo Park, California.

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17 /s/ I. Neel Chatterjee
18 I. Neel Chatterjee
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